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Federal Defender
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6 Attorneys for Defendant
Mr. Wilson
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
11)
Plaintiff,) **STIPULATION AND ORDER TO CONTINUE**
12) **STATUS CONFERENCE AND EXCLUDE TIME**
vs.)
13) Date: April 19, 2022
JOSHUA WILSON and) Time: 9:30 a.m.
14 CODY CRAMER,) Judge: Hon. John A. Mendez
15)
Defendants.)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for
18 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
20 Cramer that the status hearing currently set for April 19, 2022 at 9:30 be continued to June 28,
21 2022 at 9:30 a.m.

22 The parties specifically stipulate as follows:

- 23 1. By previous order, this matter was set for a status on April 19, 2022 at 9:30 a.m.
24 2. By stipulation, Mr. Wilson now moves to continue the status conference to June
25 28, 2022 at 9:30 a.m.
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3. To date, the government has not produced discovery to the defendants. The parties have been working on a protective order that should be filed with the Court shortly.
4. Mr. Wilson and Mr. Cramer require additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. Neither the government nor Mr. Cramer object to the continuance.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between April 19, 2022 and June 28, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: April 14, 2022

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: April 14, 2022

/s/ Kyle R. Knapp
Kyle Knapp
Attorney for Mr. Cramer

Date: April 14, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: April 15, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE